

EXHIBIT 1

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

JOSE MARIA DECASTRO,	:	
	:	Case No. 1:22-cv-204
PLAINTIFF,	:	
	:	
v.	:	JUDGE BARRETT
	:	
PAM WAGNER, et al.,	:	MAGISTRATE JUDGE BOWMAN
	:	
DEFENDANTS.	:	

**LAWRENCE COUNTY DEFENDANTS' FIRST SET OF REQUESTS FOR
ADMISSIONS, INTERROGATORIES, AND REQUESTS FOR PRODUCTION OF
DOCUMENTS TO PLAINTIFF**

Now come the Lawrence County Defendants, Major Chapman, Jane Doe, and Lawrence County, by counsel, and propounds the following Admissions, Interrogatories, and Requests for Production of Documents to Plaintiff, in accordance with Fed.R.Civ.P. 33, 34, and 36 of the Federal Rules of Civil Procedure, and requests that said produce the following documents and such Interrogatories and Admissions be answered, in writing, under oath, by said Plaintiff, within thirty (30) days in accordance with the Federal Rules of Civil Procedure.

INSTRUCTIONS FOR ANSWERING

1. The term "Amended Complaint" refers to the complaint that Jose Maria DeCastro filed in the United States District Court for the Southern District of Ohio, Western Division, on September 15, 2022 (Case No. 1:22-cv-204).
2. The terms "Plaintiff" and "you" refers to Jose Maria DeCastro.
3. The term "incident" refers to the claims set forth in the Complaint that occurred on March 29, 2022.

4. The term “Lawrence County Defendants” refers to John Chapman, Jane Doe, and Lawrence County.
5. The term “law enforcement agency” refers to a government agency responsible for enforcing the law.
6. The term “law enforcement officer” refers to a police officer employed by a law enforcement agency.
7. The term “crime” includes any misdemeanor, felony, and/or infraction.
8. The terms “document” or “documents” shall mean each and every document as defined in Federal Rule of Civil Procedure 34 in your possession, custody or control, however and by whomever prepared, produced, reproduced, disseminated or made, in any form (including without limitation electronically or magnetically stored data), wherever located, whether a copy, draft or original, including, but not limited to the following: letters, minutes, correspondence, notes or summaries of conversations, memoranda, agreements, desk calendars, appointment books, diaries, books, manuals, bulletins, circulars, catalogs, charts, electronic mail or e-mail transcripts, text messages, reports, studies, evaluations, analyses, graphs, notices, notes, notebooks, journals, statistical records, maps, laboratory results, medical records, sketches, data sheets, data compilations, computer data sheets, photographs, videotapes, sound recordings, and any other written, printed, typed, recorded or graphic matter from which information can be obtained or can be translated through detection devices in a reasonably useful form.
9. The term “concerning” means relating to, referring to, describing, evidencing, or constituting.
10. The term “relating to” means constituting or evidencing and directly or indirectly mentioning, describing, referring to, pertaining to, being connected with or reflecting upon the stated subject matter.
11. To “identify” a person means to state the person’s full name, present or last known home and

business address, telephone number(s), the person's present or last known employer and position, and the nature and dates of any past or present affiliation between the person and any party to this lawsuit.

12. In answering these discovery requests, you must disclose information that is in your possession, custody or control or within the possession, custody or control of your attorneys, agents, experts, investigators, or other representatives of you and your legal counsel. If you are able to answer part, but not all, of a discovery request, you must answer to the maximum extent possible. If you are unable to answer any discovery request because you lack sufficient information, you must describe what information you cannot provide and state what efforts you have made to obtain the unknown information. Additionally, if any part of your answer is based on information belief, you must identify the source of your information and/or the basis for your belief.
13. If you refuse to respond to a request for production of documents on the ground of privilege or work product, describe the basis of the claim fully and in detail so the Defendant(s) may make an informed judgment about whether to move to compel the production of the document(s).
14. Pursuant to Rule 26(e) of the Federal Rules of Civil Procedure, you are under a continuing duty to seasonably supplement all discovery responses. If you later discover or obtain additional information that is response to any request to produce, you must submit the supplemental documents disclosing that information as promptly and as far in advance of the trial date as possible.

REQUESTS FOR ADMISSIONS

Request for Admission No. 1: When you were arrested on March 29/31, 2022, the Ironton Police Department took possession of your cell phone.

ADMIT OR DENY:

Request for Admission No. 2: You have voluntarily disseminated information, on YouTube, Facebook, and other social media platforms, regarding controversies involving police officers and government officials in Lawrence County, Ohio.

ADMIT OR DENY:

Request for Admission No. 3: The Lawrence County Sheriff's Office, Lawrence County Jail, and the Lawrence County Defendants have never possessed your iPhone 12 Max Pro.

ADMIT OR DENY:

Request for Admission No. 4: The Amended Complaint does not name John Chapman, Jane Doe, and/or Lawrence County as Defendants.

ADMIT OR DENY:

Request for Admission No. 5: Per the Amended Complaint, you are no longer asserting any claim against Lawrence County.

ADMIT OR DENY:

Request for Admission No. 6: Per the Amended Complaint, you are no longer asserting any claim against Jane Doe.

ADMIT OR DENY:

Request for Admission No. 7: Per the Amended Complaint, you are no longer asserting any claim against John Chapman.

ADMIT OR DENY:

Request for Admission No. 8: John Chapman's request for your social security number did not violate your constitutional rights.

ADMIT OR DENY:

INTERROGATORIES

Interrogatory No. 1: Set forth your full name, current address and social security number.

RESPONSE:

Interrogatory No. 2: Set forth the full name, address, and social security number of all persons assisting you in answering these Interrogatories, Admissions and/or Requests for Production of Documents.

RESPONSE:

Interrogatory No. 3: If, in the past ten (10) years, you have been convicted of a felony or misdemeanor, state the name and address of the Court where each proceeding took place, the date and nature of the original charge against you, the nature of the charge of which you were convicted, and whether your conviction was based on a guilty plea or as a result of a trial.

RESPONSE:

Interrogatory No. 4: If, in the past ten (10) years, you have been charged with a crime, provide the city and state where you were charged with a crime, the date and nature of each charge against you and circumstances giving rise to each charge.

RESPONSE:

Interrogatory No. 5: If, in the past ten (10) years, you have been incarcerated, please provide the reason for each incarceration, the city and state where you were incarcerated, and the dates of each incarceration.

RESPONSE:

Interrogatory No. 6: If you have ever been a party to a lawsuit, state when, where and in what Court the action was commenced, the case number, the names of the parties other than yourself, whether you were a plaintiff or defendant, and the nature of the claim involved in the action.

RESPONSE:

Interrogatory No. 7: Describe, in detail, all injuries and symptoms, whether physical, mental, or emotional, you experienced as a result of the Lawrence County Defendants' actions and claim to

have been caused, aggravated, or otherwise contributed to by the incident(s) upon which the Amended Complaint is based.

RESPONSE:

Interrogatory No. 8: With regard to said injuries, state the name and address of each medical practitioner who attended to you, the name and address of each consulting physician, the name and address of each person or laboratory performing any X-Ray or any other tests upon you since the date of the incident set forth in the Amended Complaint, the dates of each visit to a practitioner and/or testing, the amounts to date of the respective bills for service and from which of them written reports have been received.

RESPONSE:

Interrogatory No. 9: During the five years immediately prior your arrest on March 29, 2022, if you have been confined to a hospital, treated by a physician, psychologist, psychiatrist, or X-rayed for any reason, give the name and address of each hospital, medical practitioner, and the approximate date of each confinement or service and state, in general, the reason for such confinement or services.

RESPONSE:

Interrogatory No. 10: Since March 29, 2022, if you have been confined to a hospital, treated by a physician, psychologist, psychiatrist, or X-rayed for any reason, give the name and address of each hospital, medical practitioner, and the approximate date of each confinement or service and state, in general, the reason for each confinement or service.

RESPONSE:

Interrogatory No. 11: If there are any injuries or conditions which you claims were caused by the Lawrence County Defendants' actions, which are an aggravation of a pre-existing condition, state which of the injuries or conditions were aggravated and the nature thereof.

RESPONSE:

Interrogatory No. 12: List each job or position of employment, including self-employment, you have held for each of the five years prior to the March 29, 2022 incident, on the date of the incident, and following the incident, and for each, set forth the following: the place of employment, name and address of the employer, date the employment commenced, date of termination, nature of employment, duties performed, name and address of immediate supervisor, rate of pay or compensation received, and reason for termination.

RESPONSE:

Interrogatory No. 13: State your annual gross income from gainful employment for each of the five years before the date of March 29, 2022, and your year-to-date earnings for 2022 and 2023.

RESPONSE:

Interrogatory No. 14: State the full name and address of each person you intend to call as a witness, both lay and expert, at trial and provide the subject matter of each person's anticipated testimony.

RESPONSE:

Interrogatory No. 15: Provide the name of the individual who posted bond for your release from the Lawrence County Jail on or about March 29, 2022.

RESPONSE:

REQUESTS FOR PRODUCTION OF DOCUMENTS

Request for Production of Documents No. 1: Provide copies of any documents reviewed and/or relied upon by you in answering the Requests for Admissions and/or Interrogatories.

Request for Production of Documents No. 2: Provides copies of any photographs that you may offer into evidence and/or that is relevant to the allegations set forth in the Amended Complaint.

Request for Production of Documents No. 3: Provide copies of your income tax returns from five years prior to the incident set forth in the Complaint.

Request for Production of Documents No. 4: Provide copies of all records of any hospital, clinic, medical doctor, psychologist, counselor, physical therapist, or other medical provider which provided services for any injury which you claim resulted from the incident set forth in the Complaint.

Request for Production of Documents. No. 5: Provide copies of any other exhibits not otherwise requested which you may use as evidence at trial or rely upon in testimony.

Request for Production of Documents No. 6: Provide any and all documents supporting any damages claim.

LAMBERT LAW OFFICE

Randall L. Lambert (0117987)
Cassandra L. Sark (0087766)
Counsel for Lawrence County Defendants

STATE OF OHIO)
)
COUNTY OF _____) SS.

SWORN TO and SUBSCRIBED in my presence by _____ on this
the _____ day of _____, 2023.

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Lawrence County Defendants' First Set of Requests for Admissions, Interrogatories, and Requests for Production of Documents to Plaintiff was mailed, postage prepaid, via USPS, on this the 8th day of March 2023 to the following:

Jose Maria DeCastro
1258 Franklin Street
Santa Monica, CA 90404

LAMBERT LAW OFFICE

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